

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

SCOTT TRAUDT,)	
Plaintiff,)	
)	
v.)	Case No. 2:24-cv-782
)	
ARI RUBENSTEIN,)	
GTS SECURITIES LLC,)	
GTS EQUITY PARTNERS LLC,)	
GTS EXECUTION SERVICES LLC,)	
CHARLES W. SCHWAB AND CO. INC.,)	
SCHWAB HOLDINGS, INC.,)	
FINANCIAL INDUSTRY REGULATORY)	
AUTHORITY,)	
Defendants,)	
)	
GARY GENSLER,)	
US SECURITIES AND EXCHANGE)	
COMMISSION,)	
“Respondent”)	
)	

**CHARLES SCHWAB & CO., INC. AND SCHWAB HOLDINGS, INC.’S
OPPOSITION TO DOCKET ENTRY NO. 135**

Defendants Charles Schwab & Co., Inc. and Schwab Holdings, Inc. (collectively, “Schwab”) submit this brief memorandum in opposition to the submission mis-captioned “Motion for Relief from Judgment” (Dkt. No. 135).

Plaintiff’s repetitive filings have crossed the line from burdensome to vexatious. *Cf.* Dkt. No. 102 (“Plaintiff is also warned of vexatious filings.”). Plaintiff has already moved for reconsideration of the Court’s order staying his claims against Schwab in favor of arbitration (Dkt. No. 117). Schwab has already opposed that motion (Dkt. No. 124). Plaintiff’s newest filing merely recapitulates Plaintiff’s

scurrilous misstatements about Schwab supposedly “destroying emails and audio recordings.” Plaintiff’s assertions are false, made without any evidentiary support, and oblivious to the documents and legal authorities Schwab provided in conjunction with Dkt. No. 124. Insofar as it raises comprehensible argument, Plaintiff’s motion is also irreconcilable with Plaintiff’s acknowledged—and signed—agreement to arbitrate with TD Ameritrade “and its successors,” including Schwab. *See* Dkt. Nos. 8-5 & 8-6. (Plaintiff also accepted a second, equally operative arbitration agreement directly with Schwab. *See* Dkt. Nos. 8-7 & 8-8.) Nothing in Plaintiff’s latest submission is previously unknown or previously unconsidered.

Throughout this proceeding, the Court and Schwab have treated Plaintiff with respect and patience. Plaintiff has responded to that solicitude by acting, repeatedly, in a manner inconsistent with Fed. R. Civ. P. 1 and Fed. R. Civ. P. 11. In a case involving total alleged losses of \$2935, *see* Dkt. No. 4 at ¶ 43, based on an Internet conspiracy theory, *see* Dkt. No. 68 at 2, Plaintiff has now filed approximately seventeen separate motions (not including procedural motions), none of which have been granted.

Schwab respectfully requests that the Court deny Plaintiff’s motion at Dkt. No. 135, prohibit Plaintiff from filing any further motions involving Schwab without leave of Court, and relieve Schwab of any obligation to respond to further submissions by Plaintiff (unless Schwab’s response is requested by the Court).

DATED at Burlington, Vermont, this 10th day of March 2025.

By: /s/ Justin B. Barnard
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*Counsel for Charles Schwab & Co., Inc. and
Schwab Holdings, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2025, the foregoing document is being filed through the CM/ECF system and that a copy of the same will be sent electronically to all registered participants.

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